

7 November 2016

By e-mail only to DraftEnvironmental2a@dialoguebydesign.co.uk

Historic England Response to High Speed Two Phase 2a Working Draft Environmental Impact Assessment Report.

Introduction.

Thank you for the opportunity to comment on the above document. Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities, to help ensure our historic environment is properly understood, enjoyed and cared for.

While we appreciate this is a working draft, we have found it difficult to critically assess the process by which the likely significant effects have been arrived at without the benefit of the background information which would be expected to accompany the full Environmental Impact Report.

Despite this, we have offered comments below on the suite of documents, either under a general heading or under the relevant CA area. For the reasons given above, we must emphasise that that these do not represent an exhaustive or detailed assessment of the impact upon all designated assets. We have largely confined ourselves to the higher graded assets (or those we feel to be of equivalent significance), and have commented generally where we believe (on the limited information available) that our view of the significant effects might differ from yours.

General.

Significant Effects

The various CA reports books, in the Cultural Heritage section, state that the purpose is to identify the likely impacts and significant effects of the Proposed Scheme. 'Significant

impact' equates to moderate and major impacts and only significant impacts are reported in the CA Reports. The problem with this approach is that where no significant effect is reported it is not always clear whether this is because the asset has a low significance (value), the magnitude of the impact is considered low, or the asset in question has been simply overlooked.

The problem is particularly acute with respect to the impact of noise. We have advised in the past that a rigorous methodology might be produced for assessing the impact of noise on heritage assets. For a number of highly graded assets, it is not possible to determine whether this has been assessed as a possible impact at all, or whether it has been assessed and considered to not be significant.

Historic Landscape Characterisation

It is stated that a detailed assessment of the effects on the historic landscape will be considered in the formal EIA report. This is disappointing. We are aware that a methodology for the assessment of the impact on the historic landscape is being developed and this might have presented an opportunity to test it. Because of this there are areas, some of which we detail below, where significant effects have not been identified.

Code of Construction Practice

The suite of documents includes a Draft Code of Construction Practice. This appears to be identical to the March 2016 version relating to Phase 1. We have concerns about this document which we submitted to you in July, none of which have apparently been taken into account. We do not propose to repeat them here, but a copy of our concerns can be provided as necessary.

Field Investigation

Although the reports refer to restrictions on access and fieldwork, no details are given, and so it is difficult to assess the influence this might have had on the assessments.

As with Phase 1, we must emphasise that the lack of intrusive evaluation which would be expected to inform the EIA Report for any other major proposal (and would probably also be required under para 128 of the NPPF) means that the significant risk of unexpected nationally important archaeological remains exists.

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Archaeological Work

The reports refer to the programme of archaeological investigation and recording which will be carried out where significant archaeological deposits will be affected. As with phase 1, we again emphasise the need for this work to be carried within a programme that has a clear and single statement of purpose. This is more the important given that this section of line runs through a landscape whose prehistoric and historic development remains relatively unknown.

Palaeoenvironmental Deposits.

As the route passes from CA4 to CA5 it enters a landscape characterised by meres and mosses, and this is recognised in the reports. Here, and perhaps also in the Trent Valley, there are locations where palaeoenvironmental deposits might be anticipated. We understand that geoarchaeological work has been undertaken to identify these locations and it would have been useful to have been able to see this in the draft EIA Report. We would hope that such areas will be identified along with all other heritage assets within the full EIA Report, and that an overarching research framework will be developed which will maximise their evidential value.

With particular relevance to CA5, but relevant elsewhere, section 15 (on water resources and flood risk assessment) could make more explicit reference to palaeoenvironmental and archaeological deposits (in addition to other ecosystem services), as changes to water flow, levels and chemical qualities can cause severe detrimental impacts. This is particularly relevant the meres and mosses within CA4 and CA5.

CA1

The route runs through a very extensive area of cropmarks, which collectively form evidence for the development of the landscape. The assessment of the impacts, variously moderate or major adverse, is probably correct, but we feel that the overall significance here might be better emphasised. This will signpost the need to consider this area holistically within a single over-arching framework, rather than deal with it as a series of disconnected assets.

CA2

Trent and Mersey Canal Conservation Area

The assessment of the impact upon the Trent and Mersey Canal Conservation Area is that the impact will be medium adverse both from construction and operation. We feel that



this cannot be sustained. The canal is located within a rural setting which is certainly indicative of, if not largely unchanged from, that which existed when it was constructed. This illustrates the degree to which the canals, in early industrial England, were predominantly a rural phenomenon in the absence of the later industrial cities they helped to develop. In addition, the Trent and Mersey follows the Trent valley for good topographical reasons, and represents one component in a predominantly north-south transport corridor, another component being the 1845 railway line which runs a parallel course for the same reason.

HS2 will cross the valley perpendicular to this predominant orientation, and the 17m high (at its highest near the canal) and 700m long viaduct can only detract from the contribution made by this setting, simply by imposing a very large modern intrusion into the landscape. While it might be argued that a further transport route simply adds to the current collection, its scale and appearance (and orientation) will be entirely incongruous in this landscape.

In our view the impact here must be high and adverse, and so the significance of the effect must be major and adverse.

Shugborough

While Shugborough Hall and Park are referred to in the report, no significant effects are reported. Given the important grouping of highly graded assets here it is vital that the background information upon which this assessment has been made be published. Until that has been done, we are not in a position to confirm that we agree that there are no significant effects on any of the highly graded assets at Shugborough. We note that, in discussing alternative routes that were considered, several offered the advantage of moving the line out of the setting of Shugborough (e.g. at 2.5.27), which indicates that the view has been taken that the current route is within the setting.

There is no mention of significant effects on the Haywood and Shugborough Conservation Area, and it is not clear whether this is an oversight or a reflection of the assessment.

Ingestre Hall and Church

At 7.4.25, in the discussion of the Ingestre Conservation Area, it is stated that the core area around Ingestre Hall, church and stables will remain 'largely unaffected'. This needs to be justified. Quite aside from its acknowledged architectural merits, the church (like all churches) is a place of meditation and reflection, and any increased noise is likely to have a detrimental impact upon that aspect of its significance. As noted above, it is difficult to know how this impact has been assessed, if at all.

Ingestre Hall is currently a residential arts centre, and a degree of tranquillity must be fundamental to that purpose. The assessment needs to address the degree to which the viability of the asset might be affected both by construction and by operational effects.

Ingestre Park

Although the landscape park around Ingestre is not registered, and is considered here as part of the Ingestre Conservation Area, we feel that it needs to be treated as an independent asset in its own right. We feel also that it should be considered an asset of moderate value, as it may well be of a significance equivalent to that of a Grade II designated designed landscape.

The wider landscape

The lack of an assessment of the impact upon the Historic Landscape Character is particularly problematic in the Ingestre/Tixall/Shugborough area. The landscaped parks are approximately contemporary and can be seen as a competitive display between the Ansons of Shugborough, the Astons at Tixall and the Talbots at Ingestre. Tixall and Ingestre were contiguous, and separated from Shugborough by the Staffs and Worcester Canal. In a way that illustrates the importance of the connections between them, the canal was deliberately widened in to the Tixall Wide here.

While the impact is recognised clearly within the landscape and visual assessment, where it is stated that major adverse effects would remain for the Ingestre Park Sandstone Estatelands, no such overall assessment is found in the Cultural Heritage section. This would be the place where an assessment of the impact on the Historic Landscape might have been addressed, and without it we believe the report cannot be said to fully report the significant effects in this area.

Taken together, this part of the Trent and Sow valleys, with its eighteenth-century designed landscapes and historic canal and railway routes, represents a particularly significant landscape whose components were designed to respect each other. Both the canal and the railways were designed to integrate with it (e.g. Tixall Wide, the Shugborough Tunnel and portals). It is vital that HS2 be designed to minimise the impact upon it, and that consideration as to how that will be done should take place at as early a stage as possible, rather than being left until after Royal Assent.

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CA3

Swynnerton Park

Although the landscape park around Swynnerton is not registered, we feel that it needs to be treated as an independent asset in its own right. We feel also that it should be considered an asset of moderate value, as it may well be of a significance equivalent to that of a Grade II designated designed landscape.

CA4

Madeley earthworks

The series of earthworks referred to at 7.4.11 illustrate the need for an assessment of the impact upon the historic landscape character. While these are assessed as a standalone historic asset, an understanding of the wider landscape context of what appears to be a very dispersed settlement pattern, set in highly irregular fields, would inform an assessment of their potential contribution to an understanding of the development of that landscape. Specifically, even from the superficial information offered, it appears that they may well have that potential, and would merit a moderate value rather than the low value ascribed to them in the report.

Tumulus at SJ774428

This undesignated potentially nationally important asset lies within 500m of the route, but no such feature is assessed within the report. It might be that one of the barrows discussed there is intended to be this one, in which case an error in location has occurred.

CA5

7.2.5 This section highlights that at present, LIDAR data are absent for some parts of the route. LIDAR has been shown to be a useful tool in identifying assets in phase 1, and where absent, this should be commissioned (at a suitable time of year regarding vegetation growth and groundwater content). If this work is already in progress, then perhaps that could be mentioned in the report.



Historic England

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